



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

January 22, 1995

CERTIFIED MAIL #P 875 704 962

Darrell Fugate
Saint Alphonsus Regional Medical Center
1055 North Curtis Road
Boise, ID 83706

Re: Saint Alphonsus Regional Medical Center (Boise) - #9502-030-2
Tier II Operating Permit (#001-00027)

Dear Mr. Fugate:

On February 21, 1995, the Division of Environmental Quality (DEQ) received Saint Alphonsus Regional Medical Center's (SARMC) Tier II Operating Permit (OP) application forms. On July 25, 1995, that application was determined complete. On October 2, 1995, a proposed Tier II OP was issued for public comment. Based on review of your application, state and federal rules and regulations, and comments received, DEQ finds this project meets the provisions of IDAPA 16.01.01.400. (Rules for the Control of Air Pollution in Idaho). Therefore, I am pleased to enclose your Tier II OP# (001-00027) for the emission sources that exist at the facility.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

Please be advised that this operating permit is subject to permit application fees of five hundred dollars (\$500.00) in accordance with IDAPA 16.01.01.470. IDAPA 16.01.01.470 became effective on March 7, 1995. Information regarding the permit application fees will be sent to you shortly.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Brian R. Monson, Chief, Operating Permits Bureau, at (298) 373-0502.

Sincerely,

Orville D. Green
Assistant Administrator
Permits & Enforcement

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Enclosure

cc: J. Palmer, SWIRO
Source File
COF
D. Sande

**Response to Comments and Questions Submitted During a
Public Comment Period on St. Alphonsus Regional Medical Center (Boise)
Proposed Tier II Operating Permit (OP) for the Entire Facility**

COMMENTS AND RESPONSES

Comment #1:

St. Alphonsus Regional Medical Center (SARMC) utilized a Consultant in the preparation of the original application for permit and also for review of the proposed permit. The technical memorandum prepared by the Consultant is attached in Appendix 1. SARMC will reference Appendix 1 for background and detailed discussion of the points being discussed in our comments about the proposed operating permit.

With the issuing of the EPA Memorandum of September 6, 1995, on "Calculating Potential to Emit (PTE) for Emergency Generators", a strong case can be made that SARMC is a true minor facility and with retroactive Permits to Construct (PTC) could opt out of the Operating Permit Program (see Appendix 1: General Comments). It is SARMC's understanding that this option still leaves open the possibility of a future enforcement action on the retroactive PTC. SARMC further understands that obtaining a Tier II Operating Permit would shield SARMC from PTC enforcement action on equipment disclosed that were without PTC. Based on this understanding, SARMC wishes to pursue the Tier II Operating Permit to limit the possibility of enforcement actions even though the facility is a true minor.

Given this new information, SARMC feels this permit should address the minimum requirements to meet the intent of Title V.

Based on the "EPA White Paper" and stated goals of IDEQ, SARMC feels the permit should address only the pollutants that, under the previous interpretation of PTE, the facility is a major for, which is NO_x. All other activities at the site are categorically exempt or below regulatory concern and should be mentioned for information only. This is consistent with EPA guidelines and IDEQ precedent with permitting other facilities. A detailed discussion of these points is found in Appendix 1, Pages 2 & 3. The permit should be structured to address only NO_x and require the minimum amount of recordkeeping to satisfy this requirement. Recordkeeping should be designed to demonstrate compliance easily for SARMC as the operator and easy for IDEQ use in the on-going review of this facility. The sectional comments are made with this basic premise in mind.

DEQ Response:

In response to the review and suggestions from SARMC with regards to the proposed operating permit, the following are comments and actions taken by DEQ:

- A) Cognizant of the fact that the facility can be major only if NO_x emissions are uncontrolled, the permit will primarily be structured to address NO_x compliance and record keeping requirements.
- B) However, with full awareness and concern that the facility is located in a PM-10 and CO non-attainment area, and that PM-10 emissions can cause an exceedence of the ambient air quality standards, particulate emission limits are also addressed in the permit.
- C) To give maximum flexibility to the SARMC to respond to electrical power outages and natural fuel gas supply interruptions without any jeopardy to the basic purpose and existence of the facility, which is the care and comfort of the sick, pertinent sections have been amended in response to comments pertaining this matter.

SPECIFIC COMMENTS

BOILERS

Comment #2: Section 1.1 - The process description of boiler operation should be modified to note that one boiler is always on standby while another operates. When in standby, the boiler steam valve is closed and the boiler is kept warm by automatically cycling the burner at the low fire rate.

DEQ Response: DEQ revised the final operating permit (OP) to reflect this comment. Section 1.1, page 2 of 13 is amended to include the proposed additional statement as follows:

"One (1) boiler is always on standby, with the main valve closed and the burner on automatic low fire rate cycle."

Comment #3: Section 1.3.5 - Boiler #5 is a hot-water boiler, and therefore, should not have a maximum steam capacity. The application did not contain any reference to a steam capacity for this boiler.

DEQ Response: DEQ revised the final OP to reflect this comment. The maximum steam capacity of 5.0 MMBtu/hr is included in Section 1.3.4, page 3 of 13 of the OP. The sentence will read as follows:

"Maximum Heat Input 5.0 MMBtu/hr"

Comment #4: Section 3.4 - The second sentence in this section should read as follows: "This limit shall not apply during times of ~~electric power outages~~ interrupted natural gas supply to the hospital".

DEQ Response: DEQ revised the second sentence of Section 3.4, page 4 of 13 of the proposed permit to reflect the proposed change. However, operations on No. 2 diesel fuel are limited to cases of interrupted natural gas supply to the hospital due to supply line distribution problems, unavailability of natural gas fuel, and other natural gas supply outages beyond reasonable control of SARMC. The revised sentence will read as follows:

"Operations of Boilers #1, #2, #3, and #5 on No. 2 diesel fuel shall not exceed forty-eight (48) hours per boiler per year. This limit shall not apply during times of interrupted natural gas supply to the hospital, due to supply line distribution problems, unavailability of natural gas supply, and other natural gas supply outages beyond the reasonable control of the SARMC."

Comment #5: Section 4.1 - Since the hospital has been given a natural gas use cap of one million therms per year, installing and maintaining gas meters on each boiler would seem to be a more accurate and less labor intensive method for ensuring that the short- and long-term limits are complied with. Since one boiler is maintained on standby (operating at temperature without load), gas meters would allow for the calculation of emissions from this activity, while attempting to track the hours of burner activity would be very difficult.

DEQ Response: The monitoring and recording of the hours of operation of each boiler on natural gas is hereby deleted from Section 4.1, page 5 of 13 as proposed. However, monitoring and recording of the date, number of hours, and the reason for the operation of each boiler on No. 2 diesel fuel is required to show compliance with section 3.4 of the operating requirements.

"The Permittee shall monitor and record the date, the reason, and the number of hours that each boiler runs on No. 2 diesel fuel."

Comment #6: Section 4.2 - The permit places an operational cap of 48 hours on diesel combustion in the boilers. Since, in the application, the emissions are calculated based on the maximum oil firing rate of each boiler, there is no need to monitor fuel oil usage as long as hours of operation are monitored. SARMC would like clarification if the natural gas consumption is for all boilers or each individual boiler.

DEQ Response:

The monitoring of the amount of No. 2 diesel fuel usage of each boiler is deleted from section 4.2. Furthermore, the monitoring of the natural gas consumption shall be for the entire facility and not for each individual boiler. This shall be done on a calendar quarterly basis. Section 4.2 shall read as follows:

"The Permittee shall monitor and record on a calendar quarterly basis the total natural gas consumption of the facility."

MEDICAL WASTE INCINERATOR

Comment #7:

Section 4.1 - Saint Alphonsus is in the process of shutting down the medical waste incinerator. This piece of equipment has not operated since October 15, 1995. Currently, work is being done to facilitate the hauling of waste and when this work is completed, the incinerator and Boiler #4 will be removed. SARMC will inform IDEQ when the equipment becomes completely removed and will seek modifications to the natural gas limits and emissions inventory. Based on this, SARMC requests that the recordkeeping requirement be modified that when the incinerator is not in operation that all other recordkeeping noted in Sections 4.1.2 and 4.1.3 be eliminated.

DEQ Response:

On December 21, 1995, the SARMC informed DEQ through a letter, that the existing incinerator and the heat recovery Boiler #4, have been rendered non-operational, are isolated from the system, and are in the process of being removed. The letter also indicates that the gas and steam lines have been interrupted so as to eliminate the possibility of use while awaiting demolition. On the basis of this letter, all sections of the proposed permit that are in reference to the medical waste incinerator and the heat recovery Boiler #4 are therefore deleted and not included in the final OP.

EMERGENCY GENERATORS

Comment #8:

Section 2.1 - Emission Estimates Appendix A - For nitrogen oxides, the calculated potential to emit for Generator #6, based on 8,760 hours of operation, is incorrect. The value should be 100.74 tons per year (T/yr). Also, the PTE values for 500 and 125 hours of operation are incorrect. These values should be 5.76 and 1.44 tons per year (T/yr), respectively. The calculated PTEs for VOCs are also incorrect and should be 26.0, 1.49, and 0.37 tons per year (T/yr), respectively. The corrected values are calculated by multiplying the hourly emission rate by the number of hours and dividing by 2,000 lbs/ton.

The memorandum shows emissions for Generator #5, which is categorically exempt (Below Regulatory Concern or BRC). Because emissions from this Generator are BRC, they should not be quantified in this publicly reviewable document. The agency already determined at an earlier date that this piece of equipment is exempt from permitting. Therefore, a statement to this effect should be made in the memorandum and the permit without considering emission quantification.

DEQ Response:

Errors as discussed were caused by incorrect spreadsheet entries and have been corrected.

While emission figures for Emergency Generator #5 are at levels which are Below Regulatory Concern (BRC), they are part of emissions that contribute to the ambient air quality impact of the facility. Since the facility is located in a non-attainment area, and one of the conditions of exemption is that there is no violation of National Ambient Air Quality Standards (NAAQS), emissions from Generator #5 are made part of the analysis and thus are incorporated into the final OP.

Based on U.S. EPA guidelines that set Potential to Emit (PTE) determination of emergency diesel generators to be based on 500 hours, all PTE values for criteria pollutants with the exception of NOx, fall well below the 100 ton per year threshold limit for a source to be major. Emission limits for the diesel gen-sets as listed in Appendix B are limited to NOx emissions as they are the pollutant for which the facility can be major. Particulate matter emissions, which as the modeling shows, is a significant factor in the projected impact to ambient air in the non-attainment area, are also listed in Appendix B.

Comment #9:

Section 3.1 - To ensure the flexibility that SARMC needs for testing the generators or for other non-emergency situation, while maintaining the 125 hour per year usage cap, this section should be changed to read as follows: "The operation of each diesel emergency generator shall not exceed a maximum of five (5) hours per day, five (5) days per week, and five (5) weeks per year, or a total of 125 hours per year. The usage information supplied in the application was not meant to limit the use of the generators to those time constraints, but was supplied because the forms required information. Not having the hourly, daily, and weekly limits will not increase emissions in anyway, since hourly emissions estimated are calculated based on maximum hourly fuel usage."

DEQ Response:

To give SARMC the flexibility it needs to meet testing and emergency power needs of the facility, section 3.1, page 11 of 13 is amended to read as follows:

"The operation of each diesel engine generator shall not exceed a maximum of 125 hours per year, as per applicants submittal."

"During conditions of electrical power outages to the facility, Generators # 1 and #2, together, can simultaneously operate up to a maximum of twenty (20) hours per day. One (1) natural gas boiler can operate continuously."

STERILIZERS

Comment #10:

SARMC is a major facility for NOX only and, therefore, the sterilizer class of equipment should not be in this permit. SARMC is not a major facility for this emission source and this equipment should be exempt as an insignificant activity under IDAPA 16.01.01.317.b(30) and, therefore, this equipment should be listed as information only and no emission limit established in this permit. See the discussion in Appendix 1 - Sectional Comments.

DEQ Response:

DEQ revised the final OP to reflect this comment. The sterilizers are discussed and analyzed in the Technical Analysis Memorandum but are deleted from the final OP.

LABORATORY ACTIVITIES

Comment #11:

SARMC is not a major source of HAPs. This section of the permit should be limited to identifying that laboratory activities are carried out at SARMC and that relatively small quantities of formaldehyde and xylene are used which case insignificant amounts of HAPs to be emitted. Further, the laboratory activities described in the permit application are insignificant according to IDAPA 16.01.01.317.b(30) because the amounts of formaldehyde and xylene emitted by the activity are less than one ton per pollutant. See Appendix 1 - GENERAL COMMENTS section discussion of the applicability of IDAPA 16.01.01.317 to Tier II permits.

DEQ Response:

DEQ revised the final OP to reflect this comment. Laboratory activities are discussed and analyzed in the Technical Analysis Memorandum but are deleted from the final OP.

PAINT BOOTH

Comment #12:

SARMC is not a major source of HAPs. This section of the permit also should be limited to identifying the activity and the fact that relatively small amounts of HAPs are emitted from it. The ability to list this activity as insignificant under IDAPA 16.01.01.317.b(30) is discussed in the Appendix 1 - GENERAL COMMENTS section.

DEQ Response:

DEQ revised the final OP to reflect this comment. Paint booth activities are discussed and analyzed in the Technical Memorandum but are deleted from the final OP.

<p style="text-align: center;">STATE OF IDAHO AIR POLLUTION OPERATING PERMIT</p> <p style="text-align: center; margin-top: 20px;">GENERAL INFORMATION</p>	<p>PERMIT NUMBER</p> <div style="display: flex; align-items: center; justify-content: center;"> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">0</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">0</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">1</div> <div style="margin: 0 5px;">-</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">0</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">0</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">0</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">2</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">7</div> </div> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <div style="text-align: center;"> <p>AQCR</p> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">0</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">6</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">3</div> </div> <div style="text-align: center;"> <p>CLASS</p> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">A</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">2</div> </div> <div style="text-align: center;"> <p>SIC</p> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">8</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">0</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">6</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">2</div> </div> </div> <div style="margin-top: 10px;"> <p>ZONE</p> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">1</div> <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">1</div> </div> <div style="margin-top: 5px;"> <p>UTM COORDINATE (km)</p> <div style="display: flex; align-items: center; justify-content: center;"> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">5</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">6</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">0</div> <div style="margin: 0 5px;">.</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">2</div> <div style="margin: 0 5px;">,</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">4</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">8</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">2</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">8</div> <div style="margin: 0 5px;">.</div> <div style="border: 1px solid black; padding: 2px 5px; margin: 0 2px;">2</div> </div> </div>	
<p>1. Permittee Saint Alphonsus Regional Medical Center (SARMC)</p>		
<p>2. PROJECT Tier II Operating Permit</p>		
<p>3. ADDRESS 1055 North Curtis Road</p>	<p>TELEPHONE # (208) 378-2703</p>	<p>COUNTY Ada</p>
<p>4. CITY Boise</p>	<p>STATE Idaho</p>	<p>ZIP CODE 83706</p>
<p>5. PERSON TO CONTACT Darrell Fugate</p>	<p>TITLE Director of Engineering</p>	
<p>6. EXACT PLANT LOCATION 1055 North Curtis Road; Boise, Idaho</p>		
<p>7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Medical Hospital</p>		
<p>8. GENERAL CONDITIONS</p> <p style="margin-top: 10px;">This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.</p> <p style="margin-top: 10px;">THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DEQ'S TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEPARTMENT REVIEW IN ACCORDANCE WITH Section 16.01.01.200 OF THE Rules for the Control of Air Pollution in Idaho.</p>		
<p style="text-align: center;"><i>Dwille D. Green</i></p> <p>ASSISTANT ADMINISTRATOR DIVISION OF ENVIRONMENTAL QUALITY</p>		<p>ISSUED January 22, 1996 Date</p> <p>EXPIRES January 22, 2001 Date</p>

AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

Permittee AND LOCATION

Saint Alphonsus Regional Medical Center
Tier II Operating Permit
Boise, Idaho

001 - 000027

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5

1. SOURCE DESCRIPTION

1.1 Process Description

Four (4) boilers provide the building space heating and hot water for the main building of the facility. The primary fuel for four (4) of the boilers is natural gas and the back up fuel is No. 2 fuel oil. Boilers #1 and #2 alternately operate to produce steam during the winter. Boiler #3 produces steam during the summer, with Boiler #2 or #3 as emergency standby. Boiler #5 provides hot water and also space heating in the north tower building when steam supply from main building is inadequate.

One (1) boiler is always on standby, with the main valve closed and the burner on automatic low fire rate cycle.

1.2 Control Description

1.2.1 Emissions from Boilers #1, #2, #3, and #5 are uncontrolled.

1.3 Equipment Specifications1.3.1 Boiler #1

Manufacturer:	Cleaver Brooks
Model:	D-52
Maximum Steam Capacity:	25,000 lbs/hr
Maximum Heat Input:	31.5 MMBtu/hr
Primary Fuel (Nat. Gas):	31,500 standard cubic feet per hour (scfh)
Secondary Fuel (No. 2 Diesel)	230 gallons per hour (gph)

1.3.2 Boiler #2

Manufacturer:	Cleaver Brooks
Model:	D-52
Maximum Steam Capacity:	25,000 lbs/hr
Maximum Heat Input:	31.5 MMBtu/hr
Primary Fuel (Nat. Gas):	31,500 scfh
Secondary Fuel (No. 2 Diesel)	230 gph

1.3.3 Boiler #3

Manufacturer:	Cleaver Brooks
Model:	D-26
Maximum Steam Capacity:	10,000 lbs/hr
Maximum Heat Input:	12.8 MMBtu/hr
Primary Fuel (Nat. Gas):	12,800 scfh
Secondary Fuel (No. 2 Diesel)	105 gph

ISSUED: January 22, 1996

EXPIRES: January 22, 2001

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AIR POLLUTION OPERATING PERMIT

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Saint Alphonsus Regional Medical Center
Tier II Operating Permit
Boise, Idaho

001 - 00027

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SOURCE

Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5

1.3.4 Boiler #5

Manufacturer:	Bryan Steam Corporation
Model:	RV-500
Maximum Heat Input:	5.0 MMBtu/hr
Primary Fuel (Nat. Gas):	5,000 scfh/hr
Secondary Fuel (No. 2 Diesel)	35 gph

2. EMISSION LIMITS

2.1 PM-10 and NO_x Stack Emission Limits

PM-10 (particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers) , Nitrogen Oxide (NO_x) emissions from each of the Boilers #1, #2, #3, and #5 stacks shall not exceed pound per hour (lb/hr) values listed in Appendix A and Appendix B.

2.2 PM Stack Emission Limits

Particulate Matter (PM) emissions from each of the Boilers #1, #2, #3, and #5 stacks shall not exceed the pound per hour (lb/hr) values listed in Appendix A and Appendix B or the grain loading emission limits, as set in IDAPA 16.01.01.675 (Rules for the Control of Air Pollution in Idaho), which ever is more stringent.

2.3 Boiler Stack Aggregate Emission Limits

Aggregate annual emissions resulting from natural gas combustion from all boilers shall not exceed the ton per year (T/yr) values listed in Appendix A based on a twelve (12) month period.

2.4 Visible Stack Emission Limits

Visible emission from any boiler stack shall not exceed twenty percent (20%) opacity for more than three (3) minutes aggregate in any sixty (60) minute period, as required in IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho).

3. OPERATING REQUIREMENTS

3.1 Fuel for Boilers #1, #2, #3, and #5

The primary fuel for Boilers #1, #2, #3, and #5 shall be natural gas fuel. Secondary fuel shall be No. 2 diesel fuel.

3.2 Sulfur Content of No. 2 Diesel Fuel

Sulfur content of No. 2 diesel fuel shall not exceed a maximum of 0.5 percent by weight as per IDAPA 16.01.01.728.02 (Rules for the Control of Air Pollution in Idaho).

ISSUED: January 22, 1996
EXPIRES: January 22, 2001

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AIR POLLUTION OPERATING PERMIT

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Tier II Operating Permit
Boise, Idaho

001 - 00027

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Boiler #1, Boiler #2, Boiler #3, Boiler #4, and Boiler #5

3.3 Boiler #1, #2, #3, and #5 Boiler Operations

Operation of Boilers #1, #2, #3, and #5 on No. 2 diesel fuel shall not exceed forty-eight (48) hours per boiler per year. This limit shall not apply during times of interrupted of natural gas supply to the hospital, due to supply line distribution problems, unavailability of natural gas supply, and other natural gas supply outages beyond the reasonable control of the SARMC.

3.4 Maximum Natural Gas Consumption

The total maximum natural gas consumption of Boilers #1, #2, #3, and #5 shall not exceed 1,000,000 therms per year.

4. MONITORING AND RECORDKEEPING REQUIREMENTS

4.1 Operation on Diesel Fuel

The Permittee shall monitor and record the date, the reason, and the number of hours that each boiler operates on No. 2 diesel fuel.

4.2 Natural Gas Fuel Consumption

The Permittee shall monitor and record on a calendar quarterly basis the total natural gas consumption of the facility.

4.3 Maintenance of Records

The most recent two year compilation of data as required in Sections 4.1 and 4.2 of this permit shall be kept on site at all times and shall be made available to Department representatives upon request.

5. REPORTING REQUIREMENTS

5.1 Operations Report

The Permittee shall submit to the Department an annual report, which shall include the following:

5.1.1 The total annual natural gas fuel consumption of the entire facility.

5.1.2 The total number of hours per boiler per year that each boiler operated on No. 2 diesel fuel.

ISSUED: January 22, 1996
EXPIRES: January 22, 2001

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PERMIT NUMBER

Permittee AND LOCATION

Saint Alphonsus Regional Medical Center
Tier II Operating Permit
Boise, Idaho

001 - 00027

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Emergency Generators #1, #2, #3, #4, #5, and #6

1. SOURCE DESCRIPTION

1.1 Process Description

Six (6) emergency diesel generators supply emergency electric power to the facility in cases of power supply outages.

1.2 Control Equipment

There are no emission control equipment associated with any of the six (6) emergency diesel generators.

1.3 Equipment Specification1.3.1 Generator #1

Manufacturer:	Caterpillar
Model:	D398
Rated Capacity:	675 kw
Fuel:	No. 2 diesel fuel

1.3.2 Generator #2

Manufacturer:	Caterpillar
Model:	D349-SRCR
Rated Capacity:	750 kw
Fuel:	No. 2 diesel fuel

1.3.3 Generator #3

Manufacturer:	Kohler
Model:	60ROZ571
Rated Capacity:	60 kw

1.3.4 Generator #4

Manufacturer:	Detroit Diesel
Model:	573rsl7034BP
Rated Capacity:	750 kw

1.3.5 Generator #5

Manufacturer:	Kohler
Model:	80ROZJ
Rated Capacity:	80 kw

ISSUED: January 22, 1996
EXPIRES: January 22, 2001

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AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

Permittee AND LOCATION

Saint Alphonsus Regional Medical Center
Tier II Operating Permit
Boise, Idaho

001 - 00027

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SOURCE

Emergency Generators #1, #2, #3, #4, #5, and #6

1.3.6 Generator #6

Manufacturer:
Model:
Rated Capacity:

Kohler
600ROZD71
600 kw

2. EMISSION LIMITS

2.1 Stack Emission Limits

PM-10 (as defined in IDAPA 16.01.01.006.71), and oxides of nitrogen (NO_x) emissions from the stacks of each diesel emergency generator shall not exceed the corresponding pound per hour (lb/hr) and ton per year (T/yr) emission limits listed in Appendix B.

2.2 Particulate matter (PM) emissions from each of the Generators #1, #2, #3, #4, #5, and #6 stacks shall not exceed the pound per hour (lb/hr) values listed in Appendix B or the grain loading emission limits, as set in IDAPA 16.01.01.675 (Rules for the Control of Air Pollution in Idaho), which ever is more stringent.

2.3 Visible Emission Limits

Visible emissions from the exhaust stack of each diesel emergency generator shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as per IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho) and as determined by using the Department's "Procedure's Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS

3.1 Operating Schedule

The operation of each diesel emergency generator shall not exceed a maximum of 125 hours per year, as per applicant's submittal. This limit shall not apply during times of electric power outages to the hospital.

During conditions of electrical power outages to the facility, Generators #1 and #2 can simultaneously operate up to a maximum of twenty (20) hours per day. One (1) boiler can concurrently operate continuously on natural gas fuel.

3.2 All emergency generators shall not be operated, except for emergency, during any period in which an Atmospheric Stagnation Advisory and/or a mandatory Wood Stove Curtailment in Boise have been declared by the Department.

3.2.1 Fuel Specification

All six (6) emergency diesel generators shall use No. 2 diesel fuel exclusively.

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EXPIRES: January 22, 2001

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AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

Permittee AND LOCATION

Saint Alphonsus Regional Medical Center
Tier II Operating Permit
Boise, Idaho

001 - 00027

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Emergency Generators #1, #2, #3, #4, #5, and #6

3.3 Sulfur Content of No. 2 Diesel Fuel

Sulfur content of No. 2 diesel fuel shall not exceed a maximum of 0.5 percent by weight as per IDAPA 16.01.01.728.02 (Rules for the Control of Air Pollution in Idaho).

4. MONITORING AND RECORDKEEPING REQUIREMENTS

4.1 Emergency Generator Operations

The Permittee shall monitor and record the date, number of hours of operation, and reason for the operation of each emergency generating set. The most recent two years compilation of data shall be kept on site at all times and shall be made available to Department representatives upon request.

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Fugitive Sources

1. SOURCE DESCRIPTION

1.1 Process Description

Fugitive particulates at the facility are due to traffic activities on paved roads and on parking areas.

2. CONTROL DESCRIPTION

Any fugitive emissions from the facility's paved roads or parking areas shall be reasonably controlled in accordance with IDAPA 16.01.01.650 (Rules for the Control of Air Pollution in Idaho).

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APPENDIX A
SAINT ALPHONSUS REGIONAL MEDICAL CENTER
NATURAL GAS BOILERS
HOURLY (lb/hr) AND ANNUAL (T/yr) POINT SOURCE EMISSION LIMITS

SOURCE	PM		PM-10		NO _x	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler #1	0.43		0.43		4.41	
Boiler #2	0.43		0.43		4.41	
Boiler #3	0.18		0.18		1.79	
Boiler #5	0.06		0.06		0.50	
Aggregated Boilers		0.69		0.69		7.00

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APPENDIX B

SAINT ALPHONSUS REGIONAL MEDICAL CENTER

HOURLY (lb/hr) AND ANNUAL (T/yr) POINT SOURCE EMISSION LIMITS

SOURCE	PM		PM-10		NO _x	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler #1*	0.46	0.01	0.46	0.01	4.60	0.11
Boiler #2*	0.46	0.01	0.46	0.01	4.60	0.11
Boiler #3*	0.21	0.01	0.21	0.01	2.10	0.05
Boiler #5*	0.07	0.002	0.07	0.002	0.70	0.02
Generator #1	2.43	0.15	2.43	0.15	24.3	1.52
Generator #2	2.43	0.15	2.43	0.15	24.3	1.52
Generator #3	0.23	0.01	0.23	0.01	2.26	0.14
Generator #4	2.43	0.15	2.43	0.15	24.3	1.52
Generator #5	0.30	0.02	0.30	0.02	2.95	0.18
Generator #6	2.30	0.14	2.30	0.14	23.0	1.44

* Emissions shown are due to combustion of No. 2 fuel oil in the boilers.

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OPERATING PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
3. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

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- I. The Permittee shall provide the Department a minimum of thirty (30) days notice prior to the scheduled date of any performance test required pursuant to this permit. Such testing must strictly adhere to the procedures outlined in the Department's Procedures Manual for Air Pollution Control, and will not be conducted on weekends or state holidays, unless the Permittee obtains prior Department approval. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment.

The Permittee shall promptly notify the Department of any change in the testing schedule and shall provide at least five (5) working days notice prior to conducting any rescheduled test, unless the Department approves a shorter advanced notice period. Any records or data generated as a result of such performance tests shall be made available to the Department upon request.

The performance tests will be performed at the maximum production rate unless otherwise is specifically stated elsewhere in this Operating Permit. If this maximum rate is not achieved during testing, the allowable production rate will be limited to the production rate attained during testing.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

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